

EXHIBIT B



Clover Management, Inc.
348 Harris Hill Road
Williamsville, New York 14221

April 16, 2024

VIA EMAIL

Regulatory Resolutions
655 West Broadway, Suite 900
San Diego, California 92101
Attn: Thomas McNamara
Email: tmcnamara@regulatoryresolutions.com

VIA EMAIL

Consumer Financial Protection Bureau
1700 G Street NW
Washington, D.C. 20552
Attn: Vanessa Buchko, Senior Litigation Counsel
Email: vanessa.buchko@cfpb.gov

VIA EMAIL

State of New York
350 Main Street, Suite 300A
Buffalo, New York 14202
Attn: Christopher Boyd, Assistant Attorney General
Email: Christopher.Boyd@ag.ny.gov

VIA EMAIL

State of Colorado
1300 Broadway, 6th Floor
Denver, Colorado 80203
Attn: Kevin Burns, Senior Assistant Attorney General
Email: Kevin.Burns@coag.gov

VIA EMAIL

State of Delaware
820 N. French St., 5th Floor
Wilmington, Delaware 19801

Page 2 of 5
Clover Management, Inc.

Attn: Marion Quirk, Deputy Attorney General
Email: Marion.Quirk@delaware.gov

VIA EMAIL

State of Illinois
115 S. LaSalle St., 26th Floor
Chicago, Illinois 60603
Attn: Daniel Edelstein, Amanda Bacoyanis, and Matthew Davies, Assistant Attorneys General
Email: Daniel.edelstein@ilag.gov; amanda.bacoyanis@ilag.gov; Matthew.Davies@ilag.gov

VIA EMAIL

State of Minnesota
445 Minnesota Street, Suite 1200
St. Paul, Minnesota 55101-2130
Attn: Evan Romanoff, Assistant Attorney General
Email: evan.romanoff@ag.state.mn.us

VIA EMAIL

State of North Carolina
114 W. Edenton Street
Raleigh, North Carolina 27602
Attn: M. Lynne Weaver, Special District Attorney General
Email: lweaver@ncdoj.gov

VIA EMAIL

State of Wisconsin
17 West Main Street
Madison, Wisconsin 53703
Attn: Lewis W. Beilin, Assistant Attorney General
Email: beilinlw@doj.state.wi.us

VIA EMAIL

Blaise Investments LLC
450 Alton Road, Unit 1503
Miami Beach, Florida 33139
Attn: Ian Behar
Email: Nytrading@aol.com

VIA EMAIL

Fusion Capital LLC
7035 Fisher Island Drive
Miami Beach, Florida 33109
Attn: Ryan Sasson
Email: rsasson@stratfs.com

Page 3 of 5
Clover Management, Inc.

Re: Preliminary Injunction (“**Preliminary Injunction**”) ordered on March 4, 2024 by Judge Michael J. Roemer, U.S. Magistrate Judge of the U.S. District Court for the W.D.N.Y. in CFPB, et al. v. Stratfs, LLC, et al.

Case No. 1:24-cv-00040-AW-MJR (W.D.N.Y.)

Dear Receiver, Plaintiffs, Mr. Behar, and Mr. Sasson:

This letter is in response to correspondence from Vanessa Buchko of the Consumer Financial Protection Bureau (“**CFPB**”) dated April 11, 2024 delivered via email on April 11, 2024. All capitalized terms not otherwise defined herein shall have the meaning ascribed in the Preliminary Injunction.

In compliance with the Preliminary Injunction, please be advised as follows:

1. Records available to Clover Management, Inc. (“**Clover**”) indicate that as of April 15, 2024:
 - a. Blaise Investments LLC (“**Blaise**”), which is understood to be owned and controlled by Albert Ian Behar, owns a:
 - i. 5.34% Membership Interest in Clover Communities Fund IV, L.P. (“**Fund IV**”); and
 - ii. 4.08% Membership Interest in Clover Communities Fund V, LLC (“**Fund V**”).
 - b. Fusion Capital LLC (“**Fusion**”), which is understood to be owned and controlled by Ryan Sasson, owns a:
 - i. 2.67% Membership Interest in Fund IV.; and
 - ii. 4.08% Membership Interest in Fund V.
 - c. Axel Development Sag Harbor, LLC (“**Axel**”), which is understood to be owned and controlled by Ryan Sasson, owns an approximate 3.389% Membership Interest in Clover Communities Fund VI, L.P. (“**Fund VI**”).

Fund IV, Fund V and Fund VI are collectively referred to as the “**Funds**” and individually as a “**Fund**”.

2. Clover and its affiliates under common control do not maintain records nor hold any Asset controlled by or for the benefit of the Asset-Freeze Defendants other than those listed in numbered paragraph 1.

Page 4 of 5
Clover Management, Inc.

3. Enclosed please find letters from the Funds in further response to the Preliminary Injunction.

Should you have any further questions or require anything further pursuant to the Preliminary Injunction, I can be contacted at the above telephone number and via email at tbui@clovergorupinc.com.

Very truly yours,



Teia Marie Bui, Esq.
General Counsel
Clover Management, Inc.

Enclosures

CC:

VIA U.S. MAIL

Hon. Michael J. Roemer
United States Magistrate Judge
Robert H. Jackson United States Courthouse
2 Niagara Square
Buffalo, New York 14202

VIA EMAIL

Dennis C. Vacco, Esq.
Lippes Mathias LLP
50 Fountain Plaza, Suite 1700
Buffalo, New York 14202
Email: dvacco@lippes.com

VIA EMAIL

Gregory P. Photiadis, Esq.
Duke Holzman Photiadis & Gresens LLP
701 Seneca Street, Suite 750
Buffalo, New York 14210
Email: gpp@dhpqlaw.com

VIA EMAIL

James C. Thoman, Esq.
Hodgson Russ LLP

Page 5 of 5

Clover Management, Inc.

140 Pearl Street, Suite 100

Buffalo, New York 14202

Email: jthoman@hodgsonruss.com